R05-26-C-024

City of Chilton
42 School St
Chilton, WI 53014
920-849-2451
chiltonwi.gov

RE: Grant Proposal by the City of Chilton, Wisconsin to the United States Environmental Protection Agency for a Brownfield Cleanup Grant for the Former Chilton Plating Located at 420-476 E Main St; Chilton, Wisconsin

The City of Chilton, Wisconsin is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a cleanup grant for $2,807,475 as part of the USEPA Fiscal Year (FY) 2026 Brownfield Grant Competition.

Per grant application requirements, the following identifies the applicant and contact for communication with USEPA:

1. **Applicant Identification**
   a. Name of Applicant: City of Chilton, Wisconsin
   b. Address of Applicant: 42 School Street; Chilton, WI 53014

2. **Website URL:** *https://chiltonwi.gov/*

3. **Funding Requested**
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested: $2,807,475

4. **Location**
   a. City: City of Chilton
   b. County: Calumet County
   c. State: State of Wisconsin

5. **Property Information**
   a. Property Name: Former Chilton Plating
   b. Property Address: 420-476 E Main St; Chilton, Wisconsin

6. **Contacts**
    a. Project Director
        Name: David DeTroye; City Administrator/Clerk/Treasurer
        Phone: (920) 849-2451 Ext. 306
        Email address: ddetroye@chiltonwi.gov
        Mailing Address: 42 School Street; Chilton, WI 53014

    b. Chief Executive/Highest Ranking Elected City Official
        Name: Rick Jaeckels; acting Mayor
        Phone: (920) 849-2451 Ext. 307
        Email address: gmrickj.mmr1@charter.net
        Mailing Address: 42 School Street; Chilton, WI 53014

7. **General Population**
    a. City of Chilton = 4,320

8. **Other Factors**

Other Factors	**Page #**
Community population is 15,000 or less.	Yes; P1 (1.a)
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Yes; P1 (1.b)
The proposed site(s) is in a federally designated flood plain.	Yes; P2 (1.c,1.d), P7 (3.a)
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Yes; P2 (1.d)
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Yes; P2 (1.d)
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. **Releasing Copies of Applications**
    Not Applicable

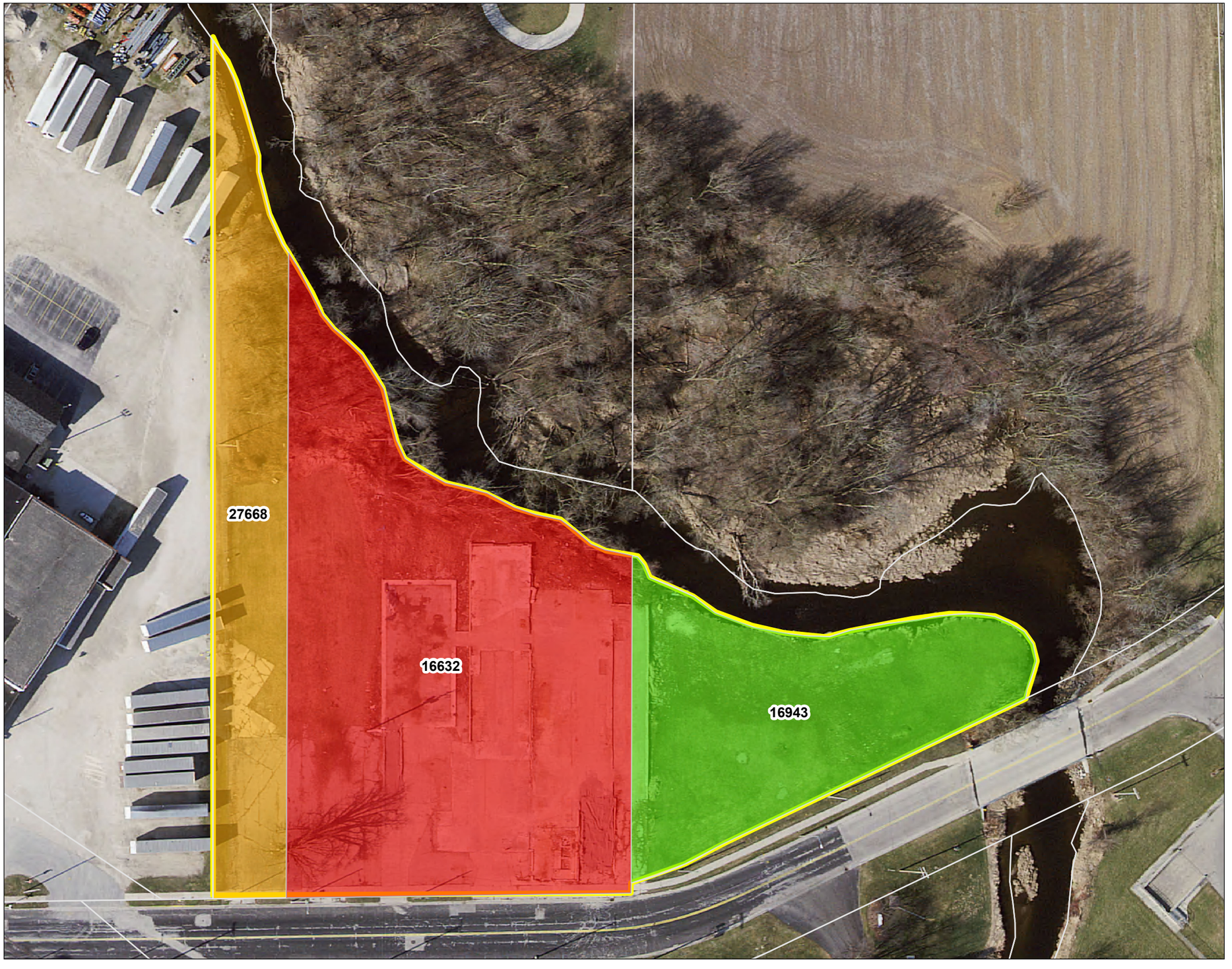


Figure No.
1
Title

Target Brownfields and Parcels

Client/Project
Former Chilton Plating Facility
415-420 East Main Street
Chilton, Wisconsin

0 50 100 Feet

Project: 193709334
Prepared by JLH on 1/26/2026

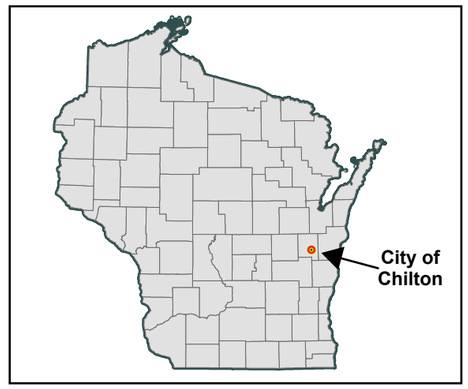
N

Legend

- Parcels
- Target Brownfield

Target Brownfields

- Parcel 1 - 420 E. Main St. (Outlot)
- Parcel 2 - 420 E. Main St.
- Parcel 3 - 476 E. Main St.



Notes
1. Coordinate System: NAD 1983 HARN WISCRS Calumet County Feet
2. Orthophotograph: Calumet County, 2021.

Stantec

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

Target Area & Brownfields

1.a. Overview of Brownfield Challenges & Description of Target Area: The City of Chilton (**City; the grant applicant**), Wisconsin, population 4,320, is located in east-central Wisconsin between Lake Michigan and the large inland Lake Winnebago. Chilton is the seat of Calumet County. Originally called Stantonville, Chilton was founded in 1845 by Moses Stanton, an African American minister from Rhode Island. Stanton set up his saw and grist mill along the Manitowoc River, spurring development in the area in the mid- to late-1800s, which was furthered by the introduction of a railroad line to Chilton in 1871, bringing industrious German settlers to the area. Chilton's location along the river allowed for industries including malting and dairy to take root, and the fertile soils meant that agricultural endeavors could thrive. An account from 1910 described the city to have "a few mills and factory" and to be "growing, steadily, because the hewed out rich farms are producing more and more.[1]"Chilton experienced a 62% growth in population from 1900 to 1950, and a 55% growth in population from 1950-2000 as industrial operations in the area continued, including operations at the former Chilton Plating Co. (1960-2008; the "**Target Property**.") However, these trends in population growth have reversed in recent years, with the population of Block Group 3 (BG-3, the **"Target Area")** in Census Tract 55015020500 (CT-205) experiencing a **12% population decrease from 2020-2023**, and the overall CT experiencing a population decline of nearly 5% over the same period[2]. Offshoring of manufacturing processes and general divestment present devastating consequences for small manufacturing communities such as Chilton, and new investments and improvements are critical to reversing trends of decline that have begun with the closure of facilities like the Target Property, which have historically provided stable and well-paying jobs to the area. The City of Chilton is committed to reinvesting in their community and has already invested millions of dollars in revitalizing the Main Street Corridor where the Target Property is located, updating utilities and well over a mile of roadways. However, the small population size means that there is limited ability for Chilton to take on cleanup projects of the scale necessary to successfully redevelop the Site for community benefit, and WDNR records indicate more than 30 brownfield/cleanup sites along this corridor. The greatest needs to be addressed with cleanup and eventual redevelopment are (1) increased recreational and exercise opportunities to support the overall health and well-being of a community with noted lack of trail access and that has experienced greater than averages incidences of certain health impacts and (2) support the overall revitalization of a main corridor in the City that has been proven to be a priority for reinvestment, kickstarting further development opportunities and removing a large, blighted site from a prime location along the Manitowoc River. The Target Property is targeted for redevelopment as a much-needed public park that will represent the eastern gateway to the revitalized Main Street, a key component of the overall plans to reinvest in the City, reverse trends of decline and provide much-needed access to green space and recreational opportunities for health-burdened Chilton residents.

1.b. Description of the Proposed Brownfield Site(s): The Site, a currently vacant former industrial area comprised of three parcels and totaling 4.20 acres, lies along the south branch of the Manitowoc River, which bounds the site to the northeast, and is located along Chilton's Main Street. The site was developed since at least 1938 when structures of unknown uses can be seen on aerial photographs; early fire insurance maps indicate some buildings located on the western side of the Site may have been associated with the Chilton Canning Company, which was primarily located west of the Site. A residential building and salvage yard were located on the easternmost parcel until 1988, since that area has remained vacant and vegetated. Most notably, Chilton Plating, a metal plating facility, operated on the center and western portions of the Site from 1960 until 2006, conducting primarily zinc, chrome, and nickel electroplating at the Site. Nickel, chrome, cadmium, and/or cyanide were stored in tanks and/or barrels on site and were utilized in the electroplating process. Prior to 1984, wastes generated onsite flowed to a blend tank that discharged to the city sewer. A pretreatment system that was installed in 1984 utilized sulfuric acid and sodium bisulfate to reduce hexavalent chromium to trivalent chromium and caustic soda and calcium chloride to neutralize the wastewater prior to discharging to the sanitary sewer system. Trichloroethylene was also used as part of the plating process in a nine square foot open top vapor degreaser and stored in an above-ground tank in the northeast corner of the main building. The 26,000 square foot (ft^2) building was demolished in 2021, leaving behind a large, blighted slab that remains in place on the central parcel of the Site today. Site investigation activities between 1988 and 2025 confirmed the presence of nickel, cyanide, lead, hexavalent chromium, chlorinated volatile organic compounds (CVOCs), petroleum volatile organic compounds (PVOCs), and per- and polyfluoroalkyl substances (PFAS) in soil and groundwater at concentrations greater than

[1] Wisconsin Historical Society. Wisconsin Local History & Biography Articles; "Early Badger History: Interesting Reminisces of First Settlers at Chilton and Vicinity", Oshkosh Northwestern; Oshkosh, Wisconsin. April 18, 1910. Viewed online at https://www.wisconsinhistory.org on December 19, 2025.

[2] Data from www.policymap.com using American Community Survey (ACS) 2019-2023 and/or 2020 Census data.

regulatory limits. These constituents are commonly used in the metal plating industry and are directly tied to the industrial history of the Site. The risks to human health from identified contaminants include cancer (including kidney, testicular, thyroid), liver toxicity, developmental impacts, thyroid impairment, and reproductive and nervous system damage, potentially a source of the extremely elevated rates of cancer in the Target Area[3].

Revitalization of the Target Area:

1.c. Reuse Strategy & Alignment with Revitalization Plans: The cleanup of the Target Property is in anticipation of planned redevelopment of the Site as a public park, which aligns directly with specific goals laid out in the *City of Chilton Comprehensive Plan 2045*[4] and the *City of Chilton Comprehensive Outdoor Recreation Plan*[5], referred to herein as "*the Plans*." Initial design plans for the proposed park have already been created, and include shoreline restoration along the Manitowoc River, a kayak launch, paved walking trails, a dog park, an open-air shelter, and a scenic overlook and gathering space near the river at the northwestern portion of the site. This park may become the future location of the local farmers' market and is a key component for sparking a renewed interest, customer base, and investment in Main Street, and a representation of higher quality investment in vacant and underutilized sites. Based on an online survey of the public used during the creation of *the Plans*, 88% of respondents rated Chilton as three or less on a scale of five for entertainment opportunities. Further, public workshops designated "Connectivity Outside Community and Trails" as a weakness, and there is a stated goal to have every Chilton resident located within half a mile of a park; none of the City's existing parks are located east of Memorial Drive, so the Target Property's location several blocks east of this street would fill a much-needed gap in green space and trail access, and only one current City park contains a multi-use trail. A primary economic development goal stated in *the Plans* is to "continue park and trail development to increase connectivity between environmental amenities and draw people to recreational uses," and including the Manitowoc River in park development was specifically called out. Almost the entirety of the Target Property is located within a federally designated flood plain or flood hazard zone, so park plans will not alter the existing grade of the land, and the planned shoreline restoration will improve flood resilience, as discussed in Section 1.d.

1.d. Outcomes & Benefits of Reuse Strategy: This redevelopment will be shovel-ready following cleanup at the Target Property, and the parcels will be rezoned to facilitate the proposed reuse as a newly created public park. The planned park, which has been fully conceptualized, will create community amenities not found elsewhere in Chilton, including a dog park, while providing further access points to the Manitowoc River, a key natural resource in the area. Although the Target Property itself is not slated for commercial development, it is a key component in the overall revitalization of the Main Street Corridor, a targeted priority for economic development in Chilton and the subject of millions of dollars of infrastructure investment in recent years.

Site redevelopment will economically benefit nearby homeowners. The presence of brownfield sites has a negative impact on home values, putting homeowners in the community at a disadvantage compared to nearby areas. This correlation is evidenced in Chilton, where the median home value of $248,600 in the immediate east-adjoining block group, which is located in a census tract with no brownfield presence, is **52% higher** than the median home value of $163,400 in the Target Area (BG-3.) Removing blight and adding community assets to this corridor will increase property values and make the area more desirable for continued investment and future development.

Shoreline restoration efforts, which will be conducted in conjunction with the creation of the new park, will improve local resilience to the impacts of extreme weather events by helping prevent erosion in the event of elevated streamflow from increased precipitation. This benefit is particularly critical to extreme weather event resilience because the Target Property is almost entirely located within a FEMA-designated floodplain or flood hazard zone, and heavy rain events are projected to increase in Wisconsin over the next several decades. Further, the replacement of the 26,000ft^2 impervious building footprint, which currently occupies a vast portion of the Site, with primarily greenspace will increase the site's capacity for stormwater capture and reduce runoff into the river during large storm events.

Few built structures are planned for the future greenspace, but energy efficient components will be used in the construction of the bathroom building, including energy-efficient lights, windows, and plumbing features.

Strategy for Leveraging Resources

1.e-1.g. Resources Needed for Site Characterization, Remediation, and Reuse: Leveraging and coordinating public funding has been and will remain a cornerstone of the Former Chilton Plating site. The City has leveraged $179,000 in

[3] Health impacts per https://wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsLanding.aspx
[4] Available at https://www.ecwrpc.org/programs/comprehensive-planning/city-of-chilton/. Adopted December 5, 2023.
[5] Available at https://issuu.com/msaprofessionalservices/docs/09322002_chilton_corp_02022022_with_appendices. February 2022.

county funds to demolish the former building at the Site, a key step in promoting proposed reuse of the Site due to the state of disrepair of the building and related health and safety concerns, environmental concerns, and financial strain. The building removal resulted in the closure of several WDNR cases at the Site, but further cleanup is necessary in order to facilitate the planned reuse. The City is eligible and will pursue the following resources to further aid in cleanup and reuse plans if needed.

Name of Resource: WDNR Wisconsin Assessment Monies	**Purpose**: 1.c.i – Site Characterization / Planning	**Status**: Eligible; Unsecured
	Additional Details: Although not anticipated, if needed, the City could secure additional grant-funded assessment work through the WDNR Wisconsin Assessment Monies program.	
Name of Resource: Insurance Recovery	**Purpose**: 1.c.ii – Site Remediation	**Status**: Eligible; Unsecured
	Additional Details: The City is searching old general liability insurance policies issued to a prior operator to confirm if insurance recovery could fund remediation at the Target Property.	
Name of Resource: WEDC Brownfields Grant Program	**Purpose**: 1.c.iii – Site Remediation	**Status**: Eligible; Unsecured
	Additional Details: Although not anticipated, if needed, the City could secure additional grant-funded remediation work through the WEDC Brownfields Grant Program.	
Name of Resource: State grants for public parks	**Purpose**: 1.c.iii – Site Reuse	**Status**: Eligible; Unsecured
	Additional Details: A variety of state-funded grant opportunities exist for construction of park features, including trails, bird habitats, and general land conservation projects. The City is eligible to apply for these funds as a local unit of government.	

1.h. Use of Existing Infrastructure:
The City of Chilton recently invested **more than $3 million** in revitalization of the public utilities on the Main Street Corridor, including new roadways, ADA-compliant sidewalks, sanitary and storm sewers, and streetlights. The Target Property sits along Main Street, where the newly improved roadway allows for easy site access (**Attachment A1**). The newly-ADA-compliant sidewalk alongside the Site will remain in place for pedestrian access following redevelopment, and streetlights are present along Main Street that encompass the area. The Target Property was previously occupied by a large industrial manufacturing facility; therefore, significant electrical, sewer, and natural gas infrastructure is present at/near the Property with enough capacity to serve the proposed reuses.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

Community Need

2.a. The Community's Need for Funding: This grant will meet the needs of a community that has an inability to draw on other sources of local funding to conduct remediation due to a small population size and disproportionate populations with low incomes.

Small Population Size. A limiting economic factor is the City's lack of "entitlement status"; therefore, the City does not receive an annual allocation of Community Development Block Grants funds that could be a key source of cleanup funding. With a population of only **4,320** and an annual (2026) budget of only **$4.2M**, the City cannot reasonably raise capital to self-fund necessary cleanup, which would consume nearly **75%** of the typical annual City budget.

Low Incomes. The median household income in the Target Area is **23% lower** than that of Calumet County overall and **15% lower than the national average**. There are large numbers of impoverished populations, including veterans; the percentage of veterans in poverty in the adjoining block group just across the river who would directly benefit from the proposed reuse of the Target Property, is **more than seven times the national average**. The EPA EnviroAtlas tool indicates that 84% of households in the Site's block group fall below the quality-of-life threshold income.[6]

Limited City/State Funding. To date, the City, in conjunction with Calumet County, has spent $3.1 million on infrastructure improvements in the Target Area and has worked tirelessly to secure grant funds and City-funded match dollars totaling **more than $400,000** on asbestos abatement, building demolition, and environmental assessment work at the Target Property. For scale, this $400k investment is equal to nearly **a third the entire City tax levy** for a year; as such, the City simply does not have capacity to self-fund the necessary cleanup to facilitate the proposed reuse at the Target Property. Available state funds have been reduced in recent years, limiting cleanup opportunities. One of the most important cuts affecting brownfields was the elimination of funding for the WDNR's Site Assessment Grant (SAG) Program, which during 1999-2010, provided 474 grants totaling $16.5M for use by local governments in assessing brownfields.

[6] https://enviroatlas.epa.gov/enviroatlas/interactivemap/

Reduced Home Values. The presence of brownfield sites has a negative impact on home values, putting homeowners in the community at a disadvantage compared to nearby areas. This correlation is evidenced in Chilton, where the median home value of $248,600 in the immediate east-adjoining block group, which is located in a census tract with no brownfield presence, is **52% higher** than the median home value of $163,400 in the Target Area (BG-3.)

2.b. Health or Welfare of Sensitive Populations: There are numerous residential parcels within a quarter mile of the Target Property, and the Main Street Corridor of Chilton, a key area targeted for redevelopment is located just west of the Site. **Table 1** summarizes some of the sensitive populations in the Target Area compared to the City of Chilton and the state.

Table 1. Sensitive Population[2]	Target Area (BG-3)	City	State of WI	United States
Elderly (65 & older)	**18.3%**	13.8%	18.0%	16.8%
Elderly in Poverty	**10.7%***	2.5%	8.6%	10.4%
People with a Disability	**13.2%**	12.0%	12.0%	13.0%
In Poverty with Disability	**36.1%***	35.4%	21.5%	21.4%
Hispanic Population	**5.4%**	1.4%	7.8%	19.0%
Females Aged 18-34	**26.0%**	22%	21.4%	22.2%

Red text indicates greater than WI/US, **bold** text indicates greater than City
*BG data unavailable, so census tract data used in place

Ageing Population. Block Group 3 (BG-3), the Target Area, has a disproportionate number of elderly residents, with 18.3% of the population over the age of 64 as compared to 13.8% for the City overall. Further, the percentage of **people over the age of 65 in poverty has increased 56% since 2000** in CT-205, totaling 10.7% compared to 8.6% in the state of Wisconsin. Elderly people face elevated health risks from pollution, so the cleanup and reuse of the Target Property will promote the health and welfare of nearby elderly residents by reducing potential contact with contaminated areas and removing a point source of contamination.

Persons with Disabilities. The percentage of people with a disability in Chilton as a county subdivision is 13.2%, greater than that of the state or nation.[2] Eliminating a pollution point source and replacing it with ADA-accessible park amenities will improve overall health and quality of life for this sensitive population. The Target Property's census tract has an **extremely high percentage of people in poverty with a disability at 36%** compared to 21% in Wisconsin and the United States overall, indicating an economic burden on those with disabilities in addition to the health risks associated with living near contaminated sites. Cleanup of the Target Property for reuse as a public park will provide new community amenities to these populations, while also helping to ease some of the environmental burden they experience.

Pregnant Women. Although pregnant women as a sensitive population is not quantifiable, the Target Area has a higher-than-average percentage of women aged 18-34, an age group with potential to become pregnant. Reducing contaminant loads and exposure in the Target Area will promote the health of people who are or will become pregnant, as the health impacts of contaminants found at the Target Property include reproductive system damage and developmental impacts, and pregnant women are identified as a sensitive population.

Serious Diseases. As discussed further in Section 2.c., the Target Area has a high incidence of serious disease, including overall cancer rates, obesity, adult asthma, stroke, Chronic Obstructive Pulmonary Disease (COPD), and incidence of heart disease. Populations with a serious disease burden experience elevated health risks from pollution.

Improve Welfare. Cleanup and redevelopment of the Target Property for residential and green space will improve welfare conditions by adding public amenities, decreasing contaminant source areas for both direct contact and groundwater contamination, and making the surrounding neighborhoods safe and walkable. Overall well-being will be increased by increased recreation in new greenspace areas and may help reduce future incidence of diseases such as heart disease; John's Hopkins Medicine states that "one of the key benefits of exercise is that it helps to control or modify many of the risk factors for heart disease."[7]

2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions:

Cancer and Overall Health. The Target Area's census tract ranks **68th percentile for heart disease and 83rd for overall cancer rates** compared to the rest of the state. Given these disease outcomes, it is not surprising that CT-205 also has a greater than normal incidence of premature death, ranking in the **67th percentile for low life expectancy** compared to the state of Wisconsin and 57th percentile compared to the nation as a whole. Reducing the contaminant load and preventing direct contact at the Target Property, where some contaminants are known carcinogens, is a step towards reducing the area's alarmingly high cancer rates. Further, Calumet County has a greater adult obesity rate than the

[7] https://www.hopkinsmedicine.org/health/wellness-and-prevention/exercise-and-the-heart

average in the state of Wisconsin and the United States as a whole[8]. Additionally, based on the CDC Places Tool, the City fares worse than the United States for rates of adult asthma, cancer, COPD, coronary heart disease, obesity, stroke, depression, binge drinking, cigarette smoking, and lack of leisure-time physical activity.[9]

Asthma. The 2022 USEPA Toxics Release Inventory indicates 69,218 pounds of toxic chemical waste was generated at 7 regulated facilities within a 10-mile radius of the Target Property.[10] Air quality is significant, and although no monitoring locations are located in the County, data from the American Lung Association *State of the Air* (2023) report gives four of five surrounding counties scores of "D" or "F" for air quality due to ozone[11]. Although data is not available for the Target Area, the percentage of children in Calumet County with asthma is slightly less than the National Average[12]; however, the adult rate of asthma is **35% greater** in Calumet County compared to the National average.[9] Undoubtedly, poor air quality has a disproportionate impact on sensitive populations, and with the change in weather patterns in Calumet County and smoke from increased forest fires from Canada migrating south, poor air quality days are increasing each year.

Birth Defects. Although data specific to the Target Area is not available, the rate of stillbirths in the County is ranked as "higher" compared to other counties in the state, and the percentage of live births with congenital anomalies in Calumet County is greater than that of three neighboring counties[13]. Developmental impacts are known risks from contaminants found at the Target Property, highlighting the need for cleanup. The March of Dimes indicates that the County has no hospitals or birth centers that provide obstetric care, limiting access to necessary care for birth defects[14].

Reduction of Health Risk. Cleanup and redevelopment of the Target Property will help to mitigate these health conditions by decreasing contamination mass and source areas; improving groundwater quality; and increasing opportunities for healthy living and exercise opportunities by creation of recreational trails, river access, and community gathering spaces.

2.d. Economically Impoverished/Disproportionately Impacted Populations: Although the industrial history of the City provided much-needed jobs to residents, heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, children) in the Target Area. The overall census tract falls in the "Moderate to High" category for the CDC/ATSDR Environmental Burden Module[2], showing that the population surrounding the Target Property is already disproportionately impacted by environmental risks, a burden that will be partially eased via cleanup and reuse of the Target Property. **Table 2** summarizes disproportionate negative impacts to the community, which has been burdened by environmental hazards even beyond exposure to contamination from the Target Property. The WDNR has issued a "do not eat" advisory for all species of fish from the South Branch of the Manitowoc River starting at Chilton due to contaminant loads, which disproportionately impacts populations that rely on fishing as a food source.[15] Reducing contaminant loads in the Target Area will likely lessen the overall contamination in the adjoining river, helping to mitigate the impact of fish contamination on local populations.

Table 2. Percentile (CT-205 compared to US)[2]	**Target Area**
Risk Management Plan Facility Proximity	80th
Toxic Releases to Air	55th
Hazardous Waste Proximity	66th
Underground Storage Tanks	80th
Lead Paint Indictor	76th

Low Educational Attainment. The Target Area (BG-3) has more than twice the percentage Hispanic/Latino population as Calumet County overall, and nearly 30% of the Hispanic/Latino population in CT-5 has some high school degree (no diploma), compared to <6% of white residents with the same level of educational attainment in CT-5; nearly 17% of the white population in CT-5, and 33% in the County, has at least a bachelor's degree, whereas 0% of Hispanic/Latinos in CT-5 and <10% in Calumet County have a bachelor's or higher.[2] Educational attainment is positively correlated with higher earnings and negatively correlated with unemployment rate, which may explain the lower-than-average household income found in the Target Area.[16] Improvements made to the Target Area, such as by reuse of the Target Property as a park, directly benefit nearby populations that are impoverished and disproportionately impacted by the

[8] countyhealthrankings.org/health-data/wisconsin
[9] https://places.cdc.gov/?view=place&locationIds=5514475
[10] https://www.epa.gov/toxics-release-inventory-tri-program
[11] https://www.lung.org/research/sota/city-rankings/states/wisconsin
[12] https://www.cdc.gov/asthma/national-surveillance-data/asthma-prevalence-state-classification.htm and https://www.cdc.gov/asthma/nhis/default.htm
[13] https://www.dhs.wisconsin.gov/stats/pubhealth-profiles.htm
[14] https://www.marchofdimes.org/peristats/reports/united-states/maternity-care-deserts
[15] https://apps.dnr.wi.gov/fishconsumptionadvisoryquery/
[16] https://www.bls.gov/emp/chart-unemployment-earnings-education.htm

environmental consequences of prior industrial site use.

In addition, CT-205 ranks in the 80th percentile in the state for lack of access to broadband internet. This lack of access can lead to further disproportionate impacts as lack of access to information could cause people to be unaware of important health notices such as the fish advisory noted above. The reuse plan for the Target Property will create connectivity between eastern residential areas and the public library, allowing for existing resources to be utilized and lessening this critical service gap.

Community Engagement

2.e. and 2.f. Project Involvement and Project Roles: The Chilton Brownfields Advisory Committee (BAC) will be formally established and approved by City Council immediately upon notice of grant award (estimated May 2026) to provide oversight/input on the City's Brownfields program. BAC members will bring important community voices to the table and were selected to address needs discussed in Section 2.a. The general public and those affected directly by the Target Property will be engaged through a Community Involvement Plan (CIP) and CBA developed in Q1 FY26 in collaboration with the BAC, as described in 2.g.

Organization	Entity's Mission	Point of Contact	Partner Role / Specific Expertise
Chilton Redevelopment Authority	Blight elimination and enters into contracts, acquires land, initiates condemnation proceedings regarding real estate, enters into bond issues/agreements.	Chris Marx cmarx@chiltonwi.gov	Facilitate redevelopment by identifying and finding resources to complete park amenities and construction at the Property.
Chilton Area Community Foundation	Established in 2001, the Chilton Area Community Foundation's mission is to enhance the quality of life for the people of the greater Chilton area.	Derek McDermott Derek-McDermott@mennlaw.com	Work with area nonprofits to advance programming, organize volunteer opportunities, and advance community engagement for future park.
Chilton Chamber of Commerce	The Chilton Chamber of Commerce is dedicated to the growth, health and prosperity of the city of Chilton. Their mission is to strengthen the business community and support economic development in Chilton and the surrounding area.	Candy Chaussee info@chiltonchamber.com	Facilitate redevelopment by providing business planning, consulting, and revitalization services to future Main Street Corridor business owners and promoting community involvement with the future park.
Calumet County Community Economic Development	Support business growth through counseling, business planning, permitting, financing, and identifying suitable property.	Jason Pausma jason.pausma@calumetcounty.org	Recruit developers to Target Area and provide financial and educational assistance to businesses developing/building near the Property
Calumet Area Community Health Foundation	Calumet Area Community Health Foundation (CACHF) is a tax-exempt public charity trust, with a purpose to promote health and health education in Calumet County.	Glen Calnin gcalnin@statebankofchilton.com	Assist with the creation, development, and implementation of health and health education programming at/with the future park.
USEPA and WDNR Project Managers	**To Be Determined -** Provide technical assistance to City PM and review/approval of work products in Tasks 1, 2, and 3; outlined in Section 3; (e.g., QAPP, SSSAP, RAP/MMP, Construction Documentation Report)		
The Health Office of the Calumet County Health Department. (Zak Van Ooyen; 920-849-1432) will attend BAC meetings once per quarter and community outreach meetings to answer any health-related questions/concerns related to the cleanup.			

2.g. Incorporating Community Input: Within one month of award, the City (grantee) will develop a site-specific CIP to leverage the expertise and networks of the RA. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2026 to integrate community involvement utilizing the CDA/BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Target Property and respond to input. The timeline for community meetings will be outlined in the CIP. The City (grantee) will hold at least two meetings annually and at key points during the

project, including: (A) a meeting after grant award to discuss the project/grant with the community, the project process and expectations, and timeframe of key activities; (B) a meeting upon posting of the final ABCA; (C) a meeting when cleanup activities begin; (D) periodic meetings during active cleanup; and (E) a final meeting when cleanup is complete.

In-person and virtual outreach options will be provided and are well accepted by the community. Community meetings will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at the Chilton Public Library, which is within walking distance of the Target Property. The meeting facility will be ADA-compliant to accommodate needs of sensitive populations (i.e., disabled or elderly). Hard copies of all project outputs will be made available at the library and City Hall. The CIP will include a variety of socially distanced engagement practices, including expanding virtual tools (e.g., online meeting platforms, social media, and webpage/email updates). As cleanup proceeds, developers are recruited, and renderings are developed, the local newspaper will likely be a significant source of information dissemination. Displays of Target Property renderings at the summer farmers' market will also allow socially distanced feedback. QR Codes on posters will allow for direct, immediate feedback on the project. Similarly to the *Plans*, physical copies of any associated materials will be made available at City Hall. Although it is anticipated that most communications will be in English, it is important that non-English speaking households are aware of environmental activities that directly impact them. Thus, the City will work with the project partners to develop and distribute information in German and Spanish, as well as offer translation and interpretation services as needed.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3.a Proposed Cleanup Plan - Contaminated Media to be Addressed: The Target Property is the most contaminated property in the City. Hazardous substances (e.g., CVOCs, PVOCs, PFAS, and heavy metals) were detected in soil and groundwater at the Target Property at concentrations significantly greater than regulatory health-based standards. The most extensive contamination from CVOCs, PVOCs, heavy metals, and PFAS remains in soil beneath the former concrete building slab, which necessitates the removal of the slab in conjunction with site excavation. Early investigations at the Site showed CVOC concentrations exceeding regulatory limits at depths greater than six feet below ground surface (bgs), so removal of all impacted soils is not a feasible approach to site remediation. As such, and as required by WDNR, creation of a sitewide engineered barrier must be completed before the Property can be redeveloped. After removing the slab from the affected area, the selected remedial alternative for reducing CVOC, PVOC, heavy metal, and PFAS contaminant mass in soil is excavation of the entire site to two feet bgs, and importing an equal amount of clean clay backfill and seeded topsoil to return the site to existing grade to maintain compliance, as necessitated by the Site's location in a federally-designated floodplain/flood hazard zone.

3.a Proposed Cleanup Plan - Cleanup Method: Upon award, the ABCA will be finalized, a QAPP prepared, and remedial design sampling (waste characterization sampling and sampling soil and groundwater to confirm current plume characteristics) will be completed. A Remedial Action Plan/Material Management Plan (RAP/MMP) will be prepared and submitted to WDNR for concurrence on the proposed cleanup at the Target Property. The selected remedial approach to be completed by appropriately licensed/certified remedial contractors, with work overseen by the QEP firm and regulatory agencies (USEPA and WDNR) under this grant will likely include: (1) Removal of 26,000 ft^2 of the existing concrete building footprint and offsite disposal of the concrete with at a licensed solid waste landfill capable of receiving PFAS wastes; (2) excavation of soil sitewide to reach two feet bgs, totaling approximately 3,715 CY of soil for offsite disposal at a licensed solid waste landfill that is able to take PFAS wastes and 3,200 CY of soil for offsite disposal at a standard solid waste landfill; (3) construction of a vegetated topsoil cap over the excavated area to stabilize the area and mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of residual soil impacts to groundwater; and (4) post-remediation groundwater monitoring to confirm stable and/or decreasing contaminant concentrations in groundwater.

3.a Proposed Cleanup Plan - Disposal Requirements: PFAS-impacted concrete and soil will be transported offsite for disposal at a licensed solid waste landfill that accepts PFAS media. Non-PFAS soil will be transported offsite for disposal at a licensed solid waste landfill. Soil cuttings and purged groundwater generated during waste characterization sampling and post-cleanup groundwater monitoring efforts will be drummed and hauled offsite by a licensed waste hauling contractor for disposal at a solid waste landfill, pending landfill approval.

3.b – 3.e Description of Tasks/Activities and Outputs. The City has developed the appropriate tools and procedures to immediately begin implementation of the grant. The City will retain a QEP per 2 CFR 200.317-200.326 and 2 CFR 1500 in Q1 FY27. This shovel-ready project will be completed within the 4-year grant performance period, as reflected below:

Task 1 - Activity: Program Management
b. Project Implementation: Retain and manage QEP, prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; update ACRES database; prepare Grant Closeout Report
c. Anticipated Project Schedule: Retain QEP (Q1 FY27). Quarterly progress reports will be submitted by Jan. 30th, Apr. 30th, Jul. 30th, and Oct. 30th of each year, with the first due on Jan 30, 2027. Annual DBE and financial reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2027. Grant closeout by Q1 FY30.
d. Task/Activity Leads: City Project Manager and City Project Coordinator (with input from QEP)
e. Outputs: Admin Records; Contractor Procurement Documentation; (12) Quarterly Reports; (3) Annual Financial Reports; (1) Grant Closeout Report. (# of outputs assumes schedule holds)
Task 2 - Activity: Cleanup Oversight
b. Project Implementation: Finalize ABCA, prepare QAPP, and complete remedial design waste characterization sampling to prepare a RAP/MMP. Develop bid specifications, obtain necessary permits, retain remedial contractor, oversee cleanup activities and DBA compliance. Conduct post-cleanup groundwater sampling and prepare Construction Documentation Report. Submit an environmental case closure request to WDNR.
c. Anticipated Project Schedule: Finalize ABCA, prepare QAPP, and complete remedial design waste characterization to prepare a RAP/MMP (Q1 FY27). Develop bid specifications, obtain necessary permits, retain remedial contractor (Q2 FY27-Q3 FY27), oversee cleanup activities and DBA compliance (Q4 FY27 – Q3 FY28). Conduct post-cleanup groundwater sampling (Q3 FY28 – Q3 FY29), and prepare a Construction Documentation Report summarizing all work under Task 2, and a WDNR Case Closure Request (Q4 FY29).
d. Task/Activity Leads: City Project Manager (PM), QEP, with input from WDNR and USEPA PMs
e. Outputs: ABCA; QAPP; RAP/MMP; bid spec; DBA summaries; Const. Doc. Report; Case Closure Request
Task 3 - Activity: Cleanup *(Remediation Contractor Only)*
b. Project Implementation: Implement cleanup plan described in Section 3.a and the RAP/MMP from Task 2.
c. Anticipated Project Schedule: Soil excavation (Q4 FY27-Q1FY28); Construct vegetated barrier/soil cap (Q4 FY27-Q1 FY28) with turf management through Q3 FY28.
d. Task/Activity Leads: City PM, Remedial Contractor(s) PM(s) (to be retained by Q3 FY27), and QEP PM
e. Outputs: Daily construction logs; landfill manifests
Task 4 - Activity: Community Outreach
b. Project Implementation: Prepare and implement a Site-Specific CIP. Host (6) biannual public meetings to discuss Target Property cleanup and redevelopment plans; community events; attend National Brownfield Conference
c. Anticipated Project Schedule: First quarterly meeting Q1 FY27; Brownfield Conference in 2028 (estimated)
d. Task/Activity Leads: City PM with input from QEP
e. Outputs: CIP, meeting deliverables, reuse plans, presentation materials

3.f. Cost Estimates: Personnel ($38/hr) and fringe ($12/hr) are an average of City staff. Construction estimates are based on engineering estimates reflective of similar projects completed in 2025 at nearby Brownfields subject to DBA.

Budget Categories		**Task 1** Program Management	**Task 2** Cleanup Oversight	**Task 3** Cleanup	**Task 4** Community Outreach	**Total**
Direct Costs	Personnel	$6,954	$3,800		$2,280	$13,034
	Fringe	$2,196	$1,200		$720	$4,116
	Supplies				$1,400	$1,400
	Travel				$2,400	$2,400
	Contractual	$6,000	$273,300		$6,000	$285,300
	Construction			$2,498,825		$2,498,825
	Other (Conference Fee)				$700	$700
	Other (WDNR Fees)		$1,700			$1,700
TOTAL BUDGET		$15,150	$280,000	$2,498,825	$13,500	$2,807,475

Task 1 – Program Management: Total Budget = $15,150
Cost Basis and Assumptions: Personnel/Fringe Costs of **$9,150** are budgeted for an estimated 183hr (@$50/hr) of work by the City Administrator and staff to manage the cooperative agreement as follows: hire (32h) and manage

(2hr/month*36 months=72hr) QEP activities, preparation of quarterly reports and maintenance of the ACRES database (3hr/quarter*13 quarters=39hr), annual financial and disadvantaged business enterprise reporting (5hr/year*3 years=15hr), prepare grant closeout report (25hr). Contractual Costs of **$6,000** are budgeted for an estimated 40hr (@ $150/hr) of work by QEP in providing assistance in completing various required reports.
Task 2 – Cleanup Oversight: Total Budget = $280,000
Cost Basis and Assumptions: Personnel/Fringe Costs of **$5,000** are budgeted for an estimated 100 hr (@ $50/hr) of work by the City Administrator and staff for developing and issuing bid specs (40hr); review project deliverables (20hr); and coordination during onsite field work (40hr). Other "WDNR fees" for regulatory oversight reviewing project deliverables is **$1,700**. Contractual Costs of **$273,300** are budgeted for the following work to be performed by the QEP: finalize ABCA, prepare QAPP, and complete remedial design waste characterization sampling to prepare a RAP/MMP to submit to WDNR (240hr @ $150/hr). Develop bid specifications and assist the City in bidding (100hr @ $150/hr), securing appropriate permits (40hr @ $150/hr); remedial contractor oversight and DBA compliance documentation (85 days @ $1,500/day); conduct post-cleanup groundwater sampling ($60,000) and prepare Construction Documentation Report (112hr @ $150/hr), and prepare case closure request (80hr @ $150/hr).
Task 3 – Cleanup: Total Budget = $2,498,825
Cost Basis and Assumptions: Construction Costs of **$2,498,825** are budgeted for: demolition/crushing/disposal of the remaining PFAS-impacted building slab (1,375 yd^3 concrete demolished and disposed of at PFAS landfill @ $500/$yd^3$); 3,375 yd^3 PFAS-impacted soil excavated and disposed of at PFAS landfill @ $375/$yd^3$; 3,200 yd^3 of VOC/metals-impacted soils excavated and disposed of at landfill @ $125/$yd^3$); importing 5,800 yd^3 of clean clay backfill @ $14/ yd^3; importing clean topsoil and finishing with grass (2,150 yd^3@ $30/$yd^3$).
Task 4 – Community Outreach: Total Budget = $13,500
Cost Basis and Assumptions: Personnel/Fringe Costs of **$3,000** are budgeted for an estimated 60 hr (@$50/hr) of work by the CDA ED and staff for planning/hosting (6) bi-annual outreach activities (10hr/meeting @ $50/hr). Supply Costs of **$1,400** are budgeted for printing costs ($1000) and mailing costs for public notices ($400). Travel Costs of **$2,400** are for (2) City staff to attend the three-day National Brownfield Conferences in 2028 [$1,560 for meals and for lodging (@$260/person/night); $700 for air travel (@$350/person); and $140 for ground transportation (@ $70/person)]. Other (Conference Fee) of **$700** for National Brownfield Conference registration fees for two staff (@$350/person). Contractual Costs of **$6,000** are budgeted for an estimated 40 hr of work by the QEP (@ $150/hr) to prepare a site-specific CIP and assist with outreach activities.

3.g. Plan to Measure and Evaluate Environmental Progress and Results: Project results/outputs and outcomes will be tracked, and progress measured/evaluated weekly using existing tools developed by the City and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1, as described in Section 3.b-3.c. Project outputs, progress, and schedule will be tracked continuously using Microsoft Project to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring and evaluating progress, outputs will be compared to the project schedule proposed in Section 3.b; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a **monthly/quarterly** basis in the ACRES database to further measure progress. Project-specific outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: (1) increase in shovel-ready portions of the Target Property suitable for redevelopment as a public park and (2) overall reduction of blight on Main Street, measured by the tonnage of building foundation removed. Outcomes advancing the City's Plans and Target Area objectives include: (1) increase in developer interest in other portions of the Main Street Corridor, and more broadly, (2) increase in property values in the vicinity of the Target Property. If the timelines for advancing one or more phases of work at the Target Property are not well-aligned with the USEPA grant project period, the City and QEP will work with USEPA and WDNR to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be tracked long-term on a five-year basis by the City and reported in future brownfield conferences, fact sheets, and/or on the City website.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

Programmatic Capability

4.a. Organizational Structure: This grant will be managed by much of the same high-performing team of City staff members who timely and successfully expended CDBG-CLOSE and WEDC Site Assessment Grant (SAG) funds to demolish the former building on the Chilton Plating Site through technical, administrative, and financial prowess, and

who successfully implemented more than $3 million of infrastructure improvements on Main Street in the last two years. The Redevelopment Authority (RA) consists of five community members, the mayor, an alderperson, the Director of Public Works, and the City Administrator. The RA will meet regularly throughout the grant expenditure period to oversee progress and provide grant management assistance as needed. The City will retain a QEP consulting firm per the requirements of 2 CFR 200.317 - 200.326 if the grant is funded. The City will also use the expertise of the WEDC, WDNR, and USEPA to provide guidance and marketing to promote reuse of the Target Property.

4.b. Description of Key Staff: David DeTroye (City Administrator). Mr. DeTroye and City staff manage the day-to-day operations of city government, working closely with citizens, community organizations, private sector individuals and businesses throughout the community. As City Administrator, Mr. DeTroye reports to the Common Council for the administrative functions of city government, such as implementing established policies and city ordinances. He keeps the Mayor and Common Council informed as to operational and administrative needs and activities of the city, providing long-range planning and administration of the budget and programs. Since 2017, Mr. DeTroye has applied for six state grants for his communities, with notable successes including a park trail extension utilizing the WI DOT Transportation Alternative Grant Program, and two separate WDNR grants funds to complete invasive aquatic plant removal in waterways and ash tree infestation abatement, respectively. Mr. DeTroye will serve as the Brownfield Project Manager for this project to leverage lessons learned while ensuring the timely and successful expenditure of funds to complete all technical, administrative, and financial requirements of the grant. In this role, Mr. DeTroye will be responsible for project performance and coordination with USEPA and WDNR and will provide financial tracking and grant documentation support to ensure that grant requirements are met. His history of successful grant management in public service roles make him well-suited to lead redevelopment efforts at the Target Brownfield.
Chris Marx (Director of Public Works). Mr. Marx will function as the Brownfield Project Coordinator for this project and will support Mr. DeTroye in coordinating work with the QEP and other City departments. He has served as an employee of the City of Chilton for more than 27 years and is deeply committed to the community.

In the event of future personnel turnover, the planned "team" approach will prevent any interruptions with the implementation of the project. Mr. Marx will be involved in daily grant operations and can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Brownfield Project Manager. Mr. DeTroye and Mr. Marx will be supported by the City administrative support staff.

4.c. Acquiring Additional Resources: The City routinely hires subcontractors and consultants to support municipal projects and will continue to do so in support of cleanup and redevelopment at the Target Property. As a small community, the City does not have a program to specifically promote local hiring/procurement to directly link members of the community to brownfield redevelopment work. However, the City will retain a remedial contractor under this grant per 2 CFR 200.317 - 200.326 and 2 CFR Part 1500. The City will additionally utilize the support of local community members via public meetings, as well as the WEDC and USEPA for guidance throughout the course of the project.

4.e. Past Performance & Accomplishments—Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements:

(i) CDBG-CLOSE Program Brownfield Cleanup Grant (FY21; $179K)

4.e.1. Purpose and Accomplishments: The City received CDBG funding through the CLOSE program to demolish the remaining building at the Target Property. Work included demolishing nearly 38,000 ft^2 of blighted industrial buildings, resulting in creating three parcels (4.2 acres) of land closer to being ready for reuse.

4.e.2. Compliance with Grant Requirements: The City maintained compliance with the workplan/schedule and the terms/conditions of the grant award. The City submitted the required financial reports, progress reports, and project deliverables in a timely manner per both the workplan schedule. The City achieved the anticipated results within the grant timeframe.

(ii) WEDC Site Assessment Grant (FY20; $150K)

4.e.1. Purpose and Accomplishments: This $150K Site Assessment Grant from WEDC was a supplement to the $159K CDBG-Close grant (described above) and resulted in creating three parcels (4.2 acres) of land closer to being ready for reuse as a public park.

4.e.2. Compliance with Grant Requirements: The City maintained compliance with the workplan/schedule and the terms/conditions of the grant award. The City submitted the required financial reports, progress reports, and project deliverables in a timely manner per both the workplan schedule. The City achieved the anticipated results within the grant timeframe.

ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

Name of Applicant: City of Chilton, Wisconsin

1. Applicant Eligibility

The City of Chilton, Wisconsin (City and grant applicant) is a "general purpose unit of local government" as that term is defined in 2 CFR 200.64 and is therefore eligible to receive a USEPA cooperative assessment agreement.

2. Previously Awarded Cleanup Grants

The proposed Target Property has not received funding from a previously awarded USEPA brownfields cleanup grant.

3. Expenditure of Existing Multipurpose Grant Funds

The grant applicant does not have an open USEPA Brownfields Multipurpose Grant; therefore, this threshold criteria does not apply.

4. Site Ownership

The Target Property was involuntarily acquired by the City (grant applicant) between 2017 (middle and eastern parcels) and 2019 (western parcel) through tax foreclosure for the purpose of blight elimination. If awarded, the City will retain ownership of the Property for the duration of the time in which Brownfield cleanup grant funds are disbursed.

5. Basic Site Information

Property Description: The Target Property consists of three contiguous parcels of land totaling 4.2 acres.
Property Name: Former Chilton Plating
Property Address: 420-476 East Main Street; Chilton, Wisconsin 53014
Property Coordinates: 44.0332138, -88.1511434

6. Status and History of Contamination at the Site

(a) Site Contamination: The Target Brownfield Property is impacted by hazardous substances associated with releases of chlorinated volatile organic compounds (CVOC) and petroleum volatile organic compounds (PVOC) in addition to releases of heavy metals (including hexavalent chromium and lead), cyanide, polycyclic aromatic hydrocarbons (PAHs), and per- and polyfluorinated alkyl compounds (PFAS) from prior industrial uses.

(b) Operational History and Current Use of the Site:
As described in the Sigma (2015) Phase I ESA, the Site was developed since at least 1938 when structures of unknown uses can be seen on aerial photographs; early fire insurance maps indicate some buildings located on the western side of the Site may have been

associated with the Chilton Canning Company, which was primarily located west of the Site. A residential building and salvage yard were located on the easternmost parcel until 1988, since that area has remained vacant and vegetated. Most notably, Chilton Plating, a metal plating facility, operated on the center and western portions of the Site from 1960 until 2006, conducting primarily zinc, chrome, and nickel electroplating at the Site. Nickel, chrome, cadmium, and/or cyanide were stored in tanks and/or barrels on site and were utilized in the electroplating process. Prior to 1984, wastes generated onsite flowed to a blend tank that discharged to the city sewer. A pretreatment system that was installed in 1984 utilized sulfuric acid and sodium bisulfate to reduce hexavalent chromium to trivalent chromium and caustic soda and calcium chloride to neutralize the wastewater prior to discharging to the sanitary sewer system. Trichloroethylene was also used as part of the plating process in a nine square foot open top vapor degreaser and stored in an above-ground tank in the northeast corner of the main building. The 26,000 square foot (ft2) building was demolished in 2021, and the slab remains in place. The City currently owns the Site, which is vacant and the areas not covered by the slab are grassy and/or vegetated.

Current Property Ownership and Use.
Ownership. The Target Property was involuntarily acquired by the City (grant applicant) between 2017 (middle and eastern parcels) and 2019 (western parcel) through tax foreclosure for the purpose of blight elimination.

Current Use. The remaining buildings were demolished in 2021. The concrete slab remains in place, and the rest of the Site is vacant/vegetated.

(c) Environmental Concerns: Multiple phases of due diligence have occurred at the Site dating back to 2014 and have confirmed the presence of hazardous substances (PAHs, Metals, PFAS, VOCs) at concentrations greater than health-based soil and/or groundwater standards. The following is an abbreviated listing of reports associated with the Property.

- Sigma, 2014. AAI Phase I Environmental Site Assessment; 415, 420, and 476 E Main Street and East Adjoining Property. December 2014.
- Sigma, 2015. Phase II Environmental Site Assessment, McNeely & Schneider Properties, Chilton, Wisconsin. October 22, 2015.
- Sigma, 2019. Summary of Site Investigation & Conceptual Remedial Action Plan, Former Chilton Plating Co., Inc. & Adjacent Property, 420 E. Main Street, Chilton, Wisconsin. May 2019.
- Sigma, 2022. Site Investigation Report Addendum, Chilton Plating Company, Inc. 420 East Main Street, Chilton, Wisconsin. February 2022.
- Stantec, 2024a. Site-Specific Sampling and Analysis Plan, Former Chilton Plating and Adjacent Parcels; Chilton, Wisconsin. March 5, 2024.
- WDNR, 2024. Supplemental Sediment Data from Chilton Plating (BRRTS ID 02-08-000040). Received by Byers, Harris. March 25, 2024.
- Stantec, 2024b. Site Investigation Report Addendum, Former Chilton Plating and Adjacent Parcels 420-476 East Main Street, Chilton, Wisconsin. November 25, 2024.

- Stantec, 2025a. Response to WDNR Review of Site Investigation Report Addendum, Chilton Plating Co. Inc, 420 East Main Street, Chilton, WI. WDNR BRRTS #02-08-000040, FID #: 408026300. April 7, 2025.
- Stantec, 2025b. Site-Specific Sampling and Analysis Plan, Supplemental Site Investigation, Former Chilton Plating and Adjacent Parcels, Chilton, Wisconsin. July 14, 2025.
- Stantec, 2025c. Supplemental Site Investigation Report, Response to WDNR Review of Site Investigation Report Addendum, Former Chilton Plating. 420 East Main Street, Chilton, Wisconsin. October 2025.
- Stantec, 2025d. Draft Analysis of Brownfield Cleanup Alternatives, Former Chilton Plating and Adjacent Parcels, Chilton, Wisconsin. December 19, 2025.

The Target Property is ideal to reuse as a much-needed public park and gateway into the revitalized Main Street Corridor in Chilton. However, the extraordinary subsurface contamination summarized in the following sections is prompting the current owner to apply for this cleanup grant.

Soil. Subsurface soil contamination is persistent throughout the site, though concentrated around the footprint of the former plating building. Decades of site investigation has shown concentrations of chlorinated volatile organic compounds (CVOCs), petroleum VOCs (PVOCs), metals including hexavalent chromium, nickel, and lead, cyanide, and PFAS greater than regulatory limits. In some cases, CVOC impacts were found at depths greater than six feet below ground surface (ft bgs). Soil impacts are attributed to former metal plating operations, with several documented releases identified by WDNR.

Groundwater. Concentrations of VOCs, PFAS, PAH, and RCRA metals were detected in several of the newly installed and existing wells sampled as part of the various stages of investigation at the Property, particularly under and directly surrounding the building footprint. However, confirmation sampling completed in more recent investigations show stability of the plume.

Vapor Intrusion. There are currently no structures with human occupancy on the Site; therefore, the vapor intrusion pathway is not currently a pathway of concern. However, a future bathroom building is planned as part of redevelopment, slated for the south-central portion of the Site where VOC impacts are documented in soil and groundwater. As a conservative measure, future buildings that will be constructed may include a SSDS that can be made active if post-construction sub-slab vapor sampling indicates the risk for vapor intrusion. Neighboring occupied buildings are not at risk from vapor migration given their distance from VOC impacts, and no vapor intrusion would result from the movement of contaminated soil within the confines of the Site during redevelopment.

As discussed in the Stantec (2025d) Draft ABCA, Remedial action activities to be funded in this grant are warranted to facilitate redevelopment at the Property and include:

- Removal and offsite landfill disposal (at a facility that accepts PFAS waste) of approximately 6,600 cubic yards (CY) of impacted soil from the Cleanup Area.

- Removal and offsite landfill disposal (at a facility that accepts PFAS waste) of approximately 1,400 CY of impacted concrete from the Cleanup Area.
- Importing clean soil (8,000 CY) to construct engineered soil caps to prevent direct contact with remaining impacted soils in areas that will remain landscaped.
- Post-construction monitoring of groundwater to confirm the stability of contamination plumes.

(d) How the Site Became Contaminated and Nature/Extents of Contamination: The Target Brownfield is impacted from hazardous substances and petroleum associated with direct releases/spills related to prior industrial use of the Property. Contamination of soil and groundwater is sitewide, though mostly concentrated in and around the building slab with migration to the east following the decreasing elevation.

7. Brownfield Site Definition

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) **not** listed or proposed for listing on the National Priorities List; (b) **not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) **not** subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Prior to acquisition, multiple phases of investigation were completed before and after the City involuntarily acquired the Property, as documented in the reports outlined in Section 6(e). The Sigma (2015) Phase II ESA was completed October 2015 per ASTM E1903-19 with subsequent Site Investigations (i.e., Sigma, 2019-2022, Stantec 2024-2025) conducted under state cleanup program oversight.

9. Site Characterization

A letter from the Wisconsin Department of Natural Resources is provided in **Attachment B1**.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The following provides details of the Target Property.

(a) CERCLA Planned or Ongoing Removal Action: None currently under oversight by USEPA.

(b-i) Unilateral Administrative Order: No orders are known.

(b-ii) Court Order: No orders are known.

(b-iii) Administrative Order on Consent: No orders are known to exist.

(b-iv) Judicial Consent Decree: No orders are known.

(b-v) Permit issued under RCRA, FWPCA, TSCA, and SWDA: No permits or corrective actions are known.

(c) RCRA-Permitted facility on the Site subject to corrective action: No facilities are known.

(d) Properties that are land disposal units that have submitted a RCRA closure notification: No closure notifications are known.

(e) PCB Release Subject to Remediation Under TSCA: None are known.

(f) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

12. (a) Threshold Criteria Related to CERCLA

A brownfield eligibility determination for the Target Property was submitted to USEPA on February 27, 2024 and approved by the agency on March 1, 2024. The following provides additional details on the Property.

i.(3) Exemptions to CERCLA Liability. The City involuntarily acquired the Property October 17, 2017 and November 11, 2019 through tax foreclosure. Since acquiring the Site, the City has complied with continuing obligations under CERCLA and no records have been identified indicating the City is considered potentially liable or known to be affiliated with any other person that is potentially liable for contamination at the Target Property.

(a) Circumstances Under Which the Property Was Acquired: Tax Foreclosure
(b) Date on Which the Property was Acquired: October 17, 2017 (Parcels 16943 and 16632) and November 7, 2019 (Parcel 27668)
(c) Timing of Hazardous Substances Disposal: Disposal of all hazardous substances at the Target Property occurred before the property was acquired by the City.
(d) Contribution Toward Hazardous Substances Disposal: The City has not caused or contributed to any release of hazardous substances at the site.

(e) Arrangement of Disposal. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure

a. The Property is enrolled in the Wisconsin Department of Natural Resources (WDNR) Environmental Repair Program (ERP) and is being tracked in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) under case number 02-08-000040. All subsurface environmental assessment work completed at the Site to date has been reviewed by the WDNR project manager. WDNR will provide oversight of the cleanup proposed under this grant to ensure that the project protects human health and the environment.

b. As described in the Stantec (2025) ABCA, the proposed cleanup will not directly impact adjacent or neighboring properties.

14. **Community Notification**

a. Draft ABCA. Revision 0 of the Stantec (2025) ABCA was prepared on December 19, 2025 and made available for public comment on December 29, 2025.

b. Community Notification Ad. The applicant published a community notification ad in the local newspaper on December 18, 2025.

c. Public Meeting. A public meeting was held to discuss the draft application and consider public comments. The meeting was held on January 6, 2026.

d. Community Notification Documents. Per the grant guidelines, the following is attached:

- The draft Stantec (2025) ABCA (**Attachment B2**)
- A copy of the newspaper ad (**Attachment B3**)
- A summary of the comments received (**Attachment B4**)
- The applicant's response to those public comments (**Attachment B5**)
- Meeting notes or summary from the public meeting (**Attachment B6)**
- Meeting sign-in sheet/participant list (**Attachment B7**)

15. **Contractors**

Not Applicable. The City will issue a RFQ to retain a QEP in compliance with 2 CFR Part 200 and 2 CFR Part 1500, if this grant is awarded. The QEP will assist the City in retaining the services of remedial contractors per the requirements of 2 CFR 200.317 through 200.327.

Attachment B1
Letter from the Wisconsin Department of Natural Resources

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor

Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

January 16, 2026

David DeTroye
City Administrator/Clerk/Treasurer
City of Chilton
42 School Street
Chilton, WI 53014
Via Email Mail Only to ddetroye@chiltonwi.gov

Subject: State Acknowledgement Letter for City of Chilton
FY26 EPA Brownfield Cleanup Grant

Dear David DeTroye,

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of the city of Chilton (the City) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

The DNR is fully committed to a collaborative partnership with the City and is able to support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with individuals in your community to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining U.S. EPA funding for this grant application is consistent with community needs, is vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

FY26 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation

For FY26, EPA requests that certain applicants for cleanup grants submit a letter from the state describing property eligibility and whether there is a sufficient level of site characterization from the environmental site assessment for the remediation work to begin on the property(ies).

- ***Eligibility***. This property is undergoing cleanup under Wisconsin's cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15; the City does not intend to enroll this project in the VPLE program.

- ***Site assessment and characterization status***. Site characterization is sufficient to allow remediation work to begin on the site. For the property described in the attached request, dated January 6, 2026, the applicant stated the following:
  Assessment work at the Property began by Sigma (2014) and was recently completed by Stantec (2025). The Stantec (2025) Supplemental Site Investigation Report addressed WDNR final data gaps and

was submitted to WDNR on 12/17/2025 for review. A RAP will be prepared and submitted to WDNR prior to June 15. As such, the proposed cleanup can begin as soon as USEPA awards funding.

The DNR is requesting additional investigation at the site following review of the 2025 Supplemental Site Investigation Report for refinement of the groundwater plume and sediment sampling; however, this additional investigation should not impact the ability to begin remedial activities at the site.

Based on the information provided by the applicant, the DNR believes site characterization is complete to an extent that allows remediation work to begin at this site.

Sincerely,

Roxanne N. Chronert, Policy and Program Operations Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Attachment:
Request dated January 6, 2026

cc:
Ethan Keller, DNR NER – Ethan.Keller@wisconsin.gov
Tauren Beggs, DNR NER – Tauren.Beggs@wisconsin.gov
Denise Danelski, DNR NER – Denise.Danelski@wisconsin.gov
Katie Schulz, Stantec – Katarina.Schulz@stantec.com